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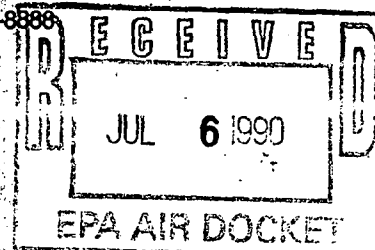
Mr. William K. Reilly
Administrator
The United States Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

23733 North Scottsdale Road
Scottsdale, Arizona 85255

P.O. Box 12999
Scottsdale, Arizona 85267

602

585-8888



Re: Application For Fuel Additive Waiver Filed
By Ethyl Corporation For Hitec 3000 Performance Additive

Dear Mr. Reilly:

Giant Industries Arizona, Inc. ("Giant") has been informed that the Ethyl Corporation of Richmond, Virginia ("Ethyl") has requested a fuel additive waiver for an automobile fuel additive known as the HiTEC 3000 Performance Additive ("HiTEC"). It is Giant's understanding that use of HiTEC in automotive vehicles may result in a significant reduction in vehicle emissions. Further, Giant understands that HiTEC is an octane enhancer. In view of these asserted properties of HiTEC, Giant urges the Environmental Protection Agency ("EPA") to give serious consideration to Ethyl's requested waiver.

Giant is, among other things, a refiner and marketer of petroleum products. Its corporate headquarters are located at 23733 North Scottsdale Road, Scottsdale, Arizona 85255. The Company's refinery is located near Gallup, New Mexico (the "Ciniza Refinery"). The refinery has a Department of Energy rated crude oil capacity of 18,000 barrels per day.

As a refiner, Giant is very interested in any octane enhancer that exhibits environmentally beneficial characteristics. Such an octane enhancer could provide numerous benefits to the refining industry, as well as to the country as a whole. For example, by allowing refiners to decrease the severity of crude oil processing, it could reduce the amount of crude oil needed to produce a given amount of petroleum product as well as reduce refinery wear and tear.

Giant does not have the ability to verify the claims made by Ethyl for HiTEC. If, however, it has the environmental benefits discussed in Ethyl's application, Giant hopes that EPA will seriously consider granting Ethyl's waiver request.

Sincerely,

Carl D. Shook
Vice President
Refining Operations

CDS/mtw